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December 29, 1998

BY HAND DELIVERY


Ms. Magalie R. Salas
Secretary
Office of the Secretary
Federal Communications Commission
The Portals TW-A325
445 12th Street, SW
Washington, DC 20554

Re: Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband
Transmission Systems (ET Docket No. 98-153)

Dear Ms. Salas:

Enclosed please find an original and four (4) copies of a Motion for Extension of Time submitted on behalf of **Zircon Corporation** in the above-captioned proceeding. If you have any questions or concerns regarding this filing please contact me directly.

Very truly yours,


Terry G. Mahn

DXM
Enclosures

cc: Zircon Corporation
Mr. Dale N. Hatfield, Chief (FCC/OET)
Ms. Rebecca Dorch, Deputy Chief (FCC/OET)
Ms. Karen Rackley, Chief, Technical Rules Branch (FCC/OET)

Our File: 07147/005001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of))
Revision of Part 15 of the Commission's) Docket No. 98-153
Rules Regarding Ultra-Wideband)
Transmission Systems)
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To: The Commission


MOTION FOR EXTENSION OF TIME

Zircon Corporation (Zircon), by its counsel, hereby requests an extension of the 30 day reply comment deadline in the Commission's Notice of Inquiry, FCC 98-208 (released September 1, 1998), to January 18, 1998. Zircon requests the additional time to prepare a meaningful response to the unexpectedly large number of comments filed, many of which contain substantive technical appendices and policy arguments that are unique to the novel technology under consideration in this NOI.

No party will be prejudiced by this extension of time for replies. To the contrary, the public interest will be served by a more careful examination of the issues raised and a fuller development of the official record in this proceeding.

Thank you in advance for your consideration of this request.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'TGM', is written over a horizontal line.

Terry G. Mahn, Esq.
Fish & Richardson P.C.
601 13th Street, N.W.
Washington, DC 20005

Counsel for Zircon Corporation

December 29, 1998

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